

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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JOSHUA J. BELOW  
by his Guardian, DEBRA BELOW,  
CHARLIE ELIZABETH BELOW., a minor  
By her Guardian ad Litem, DANIEL A. ROTTIER,

PATRICK JOSHUA BELOW., a minor  
by his Guardian ad Litem, DANIEL A. ROTTIER,

**CASE NO.: 3:15-cv-00529-wmc**

Plaintiffs,

DEAN HEALTH PLAN, INC.

Involuntary Plaintiff,

v.

STAR BLUE BELOW-KOPF

Intervening Plaintiff,

v.

YOKOHAMA TIRE CORPORATION,  
ABC INSURANCE COMPANY,  
YOKOHAMA CORPORATION OF AMERICA,  
DEF INSURANCE COMPANY,  
YOKOHAMA CORPORATION OF NORTH AMERICA,  
GHI INSURANCE COMPANY,  
YOKOHAMA TIRE MANUFACTURING VIRGINIA, LLC.,  
JKL INSURANCE COMPANY,  
YOKOHAMA RUBBER COMPANY, LTD.,  
MNO INSURANCE COMPANY.

Defendants

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**PLAINTIFF'S REQUESTED JURY INSTRUCTIONS**

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Plaintiffs, by their attorneys, Habush Habush & Rottier, S.C., respectfully request the Court to read to the jury, in addition to the court's standard jury instructions, the following Seventh Circuit Pattern Civil Jury Instructions:

- 1.23            Summaries
- 1.24            Demonstrative Exhibits
- 1.25            Multiple Claims (first paragraph)
- 1.27            Burden of Proof

Plaintiffs also respectfully request the Court to read to the jury the following Wisconsin Civil Jury Instructions

- 145            Special Verdict Questions: Interrelationship
- 150            Damage Question Answered by the Court
- 261            Medical or Scientific Treatise in Evidence
- 305            Measurements
- 354            Presumptions- Conflict As To Existence of Basic Fact; No Evidence Introduced from which Nonexistence of Presumed Fact Could Be Inferred (modified to include facts) (attached)
- 1005           Negligence: Defined
- 1105A          Management and Control – Emergency
- 1500           Cause
- 1700           Damages: General
- 1756           Personal Injuries: Past Medical and Health Care Expenses
- 1758           Personal Injuries: Future Medical and Health Care Expenses
- 1766           Personal Injuries: Past Pain, Suffering & Disability (Disfigurement)

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|--------|--|
| 1767   | Personal Injuries: Future Pain, Suffering & Disability (Disfigurement)                 |
| 1795   | Personal Injury: Life Expectancy and Mortality Tables                                  |
| 1838   | Injury to Parent: Minor Child's Loss of Society and Companionship                      |
| 3240   | Negligence: Duty of Manufacturer   |
| 3242   | Negligence: Duty of Manufacturer to Warn   |
| 3254   | Duty of Buyer or Consumer: Contributory Negligence                                     |
| 3260.1 | Product Liability: Wis. Stat. § 895.047 (for Actions Commenced after January 31, 2011) |

Dated this 27th day of January, 2017

HABUSH HABUSH & ROTTIER S.C.<sup>®</sup>  
Attorneys for Plaintiffs

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